

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CASE NO. 20-10334 TPA
	:	
JOSEPH MARTIN THOMAS,	:	
	:	
Debtor.	:	
	:	CHAPTER 11
_____ JOSEPH MARTIN THOMAS,	:	
	:	
Movant,	:	RELATED TO DOC NO. 577
	:	
v.	:	JUDGE AGRESTI
	:	
NO RESPONDENT.	:	
_____	:	

POST CONFIRMATION STATUS REPORT

And now, comes the Debtor, Joseph Martin Thomas, M.D., by and through his counsel, the Quinn Law Firm, and files this Post Confirmation Status Report (the "Status Report") pursuant to Paragraph 3 of the Court's Post Confirmation Order and Notice issued on January 7, 2022 at Doc. No. 577 (the "Post-Confirmation Order").

1. On May 6, 2020, the Debtor filed a voluntary Chapter 11 Bankruptcy Petition in the United States Bankruptcy Court for the Western District of Pennsylvania, at Case No. 20-10334 TPA (the "Bankruptcy Case").

2. On January 7, 2022, the Bankruptcy Court entered an Order (the "Confirmation Order") [Doc. No. 576] confirming the Second Amended Plan of Reorganization Dated October 7, 2021 (the "Confirmed Plan") [Doc. No. 521].

3. Since Plan Confirmation, the Debtor has initiated and/or completed the following steps in an effort to consummate the Confirmed Plan:

- a. The Debtor has filed and the Court has entered an Order approving an Application to Employ and Retain Co-Auctioneers (Doc. Nos. 592 and 595);
 - b. The Debtor and the Official Committee of Unsecured Creditors of Tri-State Pain Institute, LLC have prepared and filed a Joint Motion for Public Auction Sale of Personal Property Free and Divested of Liens (Doc. No. 600), for which a hearing has been scheduled for March 24, 2022, with an auction or auctions anticipated to take place beginning in or around April of 2022; and
 - c. The Debtor and his professionals have reviewed a final draft of the proposed NOL carryback tax return and are preparing to file as early the week of February 21-25, 2022.
4. Additionally the Debtor has made initial distributions per the terms of the Confirmed Plan including, but not limited to, the following:
- a. Monthly payment(s) on the administrative and unsecured priority tax claims of the IRS per Section VI(e);
 - b. Monthly payment(s) on the unsecured priority tax claims of the PA Dept. of Revenue and Berkheimer per Section VI(e);
 - c. Payment in full of the New York State Department of Taxation and Finance de minimis unsecured priority tax claim per Section VI(e);
 - d. Payment in full of the general unsecured claims in the convenience class per Section VI(f); and
 - e. Monthly payment(s) on general unsecured claims per Section VI(g).

5. Also post-confirmation loan documents have been fully executed and \$400,000 has been paid to Wells Fargo per the Joint Stipulation and Agreed Order dated August 23, 2021 (Doc. No. 507).

6. As a result, the Debtor is current on all Confirmed Plan obligations and has moved for an extension of time to file objections to claims and other proceedings in an effort to preserve his rights until the Estate's 2021 1041 tax return can be filed and finally processed.

7. Pursuant to Section VI(a) of the Confirmed Plan, together with Paragraph (1) of the Confirmation Order, the Debtor continues to pay into escrow monthly installments for administrative professional claims pending further Court order on payment of the same.

8. The Debtor anticipates needing a further extension of post-confirmation deadlines beyond April 7, 2022, as a result of the matters pending in Paragraph 3 above.

Respectfully submitted,

THE QUINN LAW FIRM

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Counsel for Debtor

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NO RESPONDENT.	:	
_____	:	

CERTIFICATE OF SERVICE

I, the undersigned, certify that I served, or caused to be served, on the 21st day of February, 2022, a copy of the Post Confirmation Status Report upon each of the following persons and parties in interest at the address shown on the attached list.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/Michael P. Kruszewski
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Counsel for Debtor

Joseph Martin Thomas
Case No. 20-10334
Service List

The following parties received notification via the CM/ECF System and will not receive a paper copy of the filing:

Office of the United States Trustee; ustpre03.pi.ecf@usdoj.gov
Michael F.J. Romano, Esquire (TIAA Commercial Finance, Inc.); mromano@rgalegal.com
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Guy C. Fustine (Official Committee of Unsecured Creditors/Tri-State Pain Institute LLC); mwernick@kmgslaw.com
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